

United States Court of Federal Claims

BID PROTEST

_____)	
EMERGENCY PLANNING)	
MANAGEMENT, INC.)	No. 19-1024
)	
v.)	Judge Thomas C. Wheeler
)	
THE UNITED STATES)	
_____)	

**UNOPPOSED MOTION FOR LEAVE TO FILE
DOCUMENTS ELECTRONICALLY UNDER SEAL**

Pursuant to Rule App'x E.I.11., Emergency Planning Management, Inc. ("EPM"), hereby seeks leave of the Court to file documents electronically under seal. EPM did not file its Complaint under application for seal, nor did it seek a Protective Order in these proceedings. However, the Government's Administrative Record included protected information subject to the Protective Order issued in Case No. 19-308.

Counsel for EPM were admitted to the Protective Order in Case No. 19-308 to permit them access to the protected information. Under the Protective Order in Case No. 19-308, electronically filed documents containing protected information, must be filed under seal. Therefore, EPM seeks leave of the Court now in this case to file documents electronically under seal that contain protected information (e.g., to permit EPM to include protected information in its Motion for Judgment on the Administrative Record).

Respectfully submitted,

MATROSS EDWARDS LLC

Dated: August 21, 2019

/s/ Joshua B. Duvall
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CERTIFICATE OF SERVICE

I hereby certify that, on August 21, 2019, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the Court's Case Management/Electronic Case Files ("CM/ECF") system, which will send notification to all counsel of record in this matter who are registered with the Court's CM/ECF system.

/s/ Joshua B. Duvall
Joshua B. Duvall